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September 1, 2004

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VIA COURIER

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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

Re: In the Matter of Joint Application of Evercom Systems, Inc. for Expedited Approval of Indirect Transfer of Control of Domestic and International Section 214 Authority

Dear Secretary Dortch:

This letter is being submitted at the request of the Staff of the Wireline Competition Bureau to provide additional information in conjunction with the above referenced application.

None of the entities listed on pages 8 and 9 of the pending Joint Application as having (post-closing) a 10% or greater direct or indirect ownership interest ("Attributable Interest") in Evercom Systems, Inc. will hold an Attributable Interest in any other entity providing U.S. domestic telecommunications services, except that Securus Technologies, Inc. ("Securus")¹ and H.I.G.-TNetix, Inc., Alexander Enterprise Holdings Corp. ("Alexander") and H.I.G. Capital Partners III, L.P. (through their direct and indirect ownership in Securus) will hold an Attributable Interest in T-Netix, Inc. and its wholly-owned subsidiary T-Netix Telecommunications Services, Inc. (collectively "T-Netix"), which are non-dominant domestic interexchange carriers, principally providing inmate calling services.²

In addition, Tarragona Investment Group Limited ("Tarragona")³, which owns 100% of Alexander and, therefore, will hold an Attributable Interest in Evercom Systems, Inc., will also

¹As the undersigned counsel informed the Commission on August 23, 2004, TZ Holdings, Inc. has changed its corporate name to Securus Technologies, Inc. See Attachment 1.

²T-Netix currently provides such services in the states listed on Attachment 2.

³Tarragona Investment Group Limited, organized in the British Virgin Islands, is a private investment partnership whose offices are at 801 Brickell Avenue, Suite 2580, Miami, Florida 33180. It was inadvertently not included in the original Joint Application as potentially having an Attributable Interest through its ownership of Alexander.

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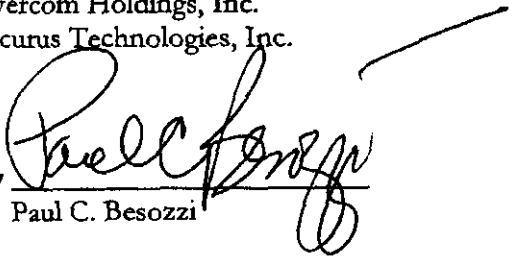
hold an Attributable Interest in T-Netix. Tarragona holds no other Attributable Interests in any other provider of U.S. domestic telecommunications services.

The Joint Applicants reiterate their request that the Joint Application is eligible for streamlined processing under Section 63.03(2)(i) because the transferee (i.e. Securus) through its subsidiaries will have a market share in the interstate, interexchange market of less than 10 percent, the transferee through its subsidiaries would provide competitive telephone exchange services or exchange access services (if at all) exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the transaction and none of the Joint Applicants is dominant with respect to any service.

Respectfully submitted,

Evercom Systems, Inc.
Evercom Holdings, Inc.
Securus Technologies, Inc.

By


Paul C. Besozzi

cc: Jennifer P. Gaines
Richard Furey
Russell Hanser